

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

ENTERGY NUCLEAR VERMONT )  
YANKEE, LLC and ENTERGY NUCLEAR )  
OPERATIONS, INC., )  
*Plaintiffs,* )

v. )

Docket No: 1:11-CV-99

PETER SHUMLIN, in his official capacity as )  
GOVERNOR OF THE STATE OF )  
VERMONT; WILLIAM SORRELL, in his )  
official capacity as the ATTORNEY )  
GENERAL OF THE STATE OF VERMONT; )  
and JAMES VOLZ, JOHN BURKE, and )  
DAVID COEN, in their official capacities )  
as members of THE VERMONT PUBLIC )  
SERVICE BOARD, )  
*Defendants,* )

**DECLARATION OF RAYMOND SHADIS IN SUPPORT OF**  
**NEW ENGLAND COALITION, INC.'S AMICUS MEMORANDUM**

Raymond Shadis declares as follows, pursuant to 28 U.S.C. § 1746:

My name is Raymond Shadis and I live at 37 Shadis Road, Edgecomb, Maine 04556. Since December 1, 2006, I have served as a technical consultant to New England Coalition – Opposing Nuclear Pollution (“NEC”, d/b/a “New England Coalition”). From December 1, 1997 to December 1, 2006, I was employed by NEC as “Staff Technical Advisor.” I recently served as NEC’s expert before the Vermont Public Service Board in Dockets 7440 and 7600, and I have testified before the Vermont Legislature regarding the relicensing of the Vermont Yankee plant. I have personal knowledge of the following exhibits:

1. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Nils Diaz, Chairman, USNRC to Mr. Michael H. Dworkin, Chairman, Vermont Public Service Board, dated May 5, 2004.
2. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt of the transcript of Public Service Board Docket No. 7440 Testimony of May 26, 2009, pages 104-139 (testimony of Mr. Colomb – Vermont Yankee Site Vice-President).

3. It has been widely reported that the cost of the condenser would be One Hundred Million Dollars. *See i.e.* Burlington Free Press article dated July 25, 2011.<sup>1</sup> Based on my experience, I believe that this is a reasonable estimate; however, it would not take into account the cost to remove the existing condenser, and install the new one, which could increase the cost of replacement by tens of millions of dollars. Therefore, the cost to replace the condenser could be as much as \$120-150 million.
4. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of the Nuclear Safety Associates Comprehensive Reliability Assessment for the Vermont Yankee Plant.
5. Attached hereto as Exhibit 5 is a true and correct copy of the Report of the Public Oversight Panel on the Comprehensive Reliability Assessment of the Vermont Yankee Nuclear Power Plant, dated March 17, 2009.
6. Attached hereto as Exhibit 6 is a true and correct copy of an excerpt of the February 8, 2011 Entergy Earnings Call for the Fourth Quarter 2010 Results (Transcript by Seeking Alpha at [www.SeekingAlpha.com](http://www.SeekingAlpha.com)).

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 2, 2011.

/s/ Raymond Shadis  
Raymond Shadis

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<sup>1</sup> Available at 2011 <http://www.burlingtonfreepress.com/article/20110725/NEWS03/110725008/Vermont-Yankee-nuclear-plant-refuel-despite-uncertainty>